

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CHRISTIANA SUNSHINE LONGWAY, and
BUENAVENTURA RIVERA,

Plaintiffs,
-against-

THE SOCIETY FOR CREATIVE ANACHRONISM, INC.,
a/k/a "SCA" or "SCA, Inc.",

Defendant.

Case No.: 21 CV 03142
(CS) (JCM)

**STIPULATION OF
SETTLEMENT
AND DISMISSAL**

-----X
IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys of record for the respective parties to the above entitled action, that the remaining claim for injunctive relief as contained in Count VI of plaintiffs' amended complaint dated November 26, 2021 (Document 25) in the above-entitled action be and the same hereby is settled and dismissed with prejudice (thereby dismissing the entire action), without interest, costs or attorney fees to any party as against the other;

IT IS FURTHER STIPULATED AND AGREED that the terms of the settlement of the claim for injunctive relief are as follows:

1. The Defendant SCA agrees that Plaintiffs are able to create a new canton called "Northpass," with the old Northpass heraldry if they meet the requirements for the establishment of a canton under current SCA rules and bylaws. The defendant SCA will administer the re-instatement of the canton, with name and former heraldry, including overseeing the process of officer selection with the input of the group participants, as well as the East Kingdom. The final selection of the starting group of officers will be approved by the SCA Seneschal and President but thereafter the established SCA procedures for officer selection will be followed. In the event of subsequent problems arising out of such selections, upon Plaintiffs' request, the SCA Seneschal and President will monitor the situation to ensure selections are done in a fair manner.

2. Upon the re-establishment of the Canton of Northpass ("Canton," or "Northpass"), the Defendant SCA agrees to remit to the Canton all monies that were in the Canton's account for SCA purposes prior to its dissolution.

3. In the event of problems or disagreements regarding the status of Northpass as an official SCA group, the SCA Seneschal and President will monitor the situation and ensure

that all SCA rules, policies and procedures are followed. Any attempt to revoke or suspend the official status of the group will be handled by the SCA Seneschal and President, with any attempted revocation to be presented to the Board of Directors. Upon plaintiffs' request, any other decisions concerning Northpass which are made by the East Kingdom shall be reviewed by the SCA Seneschal and President.

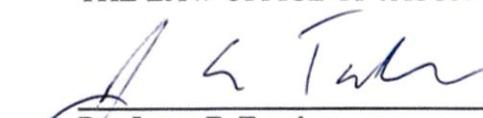
4. The SCA agrees to monitor any investigation of the Plaintiffs or the Canton of Northpass by the East Kingdom by reviewing all submissions and, upon request, consider transferring the investigation to the auspices of the SCA Seneschal. Any such investigation will be conducted pursuant to approved SCA policies and procedures. In the event that a request for transfer of the investigation is denied, the reasons for the denial shall be provided in writing.

5. If the plaintiffs are under investigation by a Kingdom or the SCA and request replacement of an investigator due to actual or perceived bias or possible conflict of interest, the request will be considered by the SCA Seneschal. If the request is deemed valid and appropriate, the SCA Seneschal will assist in the selection of a suitable replacement investigator. In the event that the request to replace the investigator is denied, the reasons for the denial shall be provided in writing.

IT IS FURTHER STIPULATED AND AGREED that a copy of this stipulation bearing signatures transmitted electronically and/or signed in counterpart shall suffice in lieu of a fully executed original and that this stipulation may be electronically filed without further notice.

Dated: New York, New York
August 30, 2022

THE LAW OFFICE OF JASON TAUCHES


By: Jason E. Tauches
Attorney for Plaintiffs
45 Prospect Street
Cambridge, MA 02139
(617) 230-4992

MALAPERO PRISCO & KLAUBER LLP


By: Jeffrey N. Rejan (JNR1580)
Attorneys for Defendant
271 Madison Avenue, 17th Floor
New York, New York 10016
(212) 661-7300

SO ORDERED:

CATHY SEIBEL, U.S.D.J.